

DON Purchase Card Program Training Stand-Down Day

Stand-Down Day Agenda

- Introduction
- Opening Remarks Mr. Larry Glasco
- GAO Audit Summary
- Policies & Procedures Existing & New
- Awareness of Misuse, Abuse, and Fraudulent Use
- DON PC Support Tools
- Review of Activity's IOP
- Discussion and Q&A
- Introduction to CD-ROM Training

DON Purchase Card Training CD-ROM

NAVSUP Executive Director Mr. Larry Glasco

Purchase
Card
Program
StandDown Day



- Policies & Procedures
- Vigilance & Awareness
- Accountability

DON Purchase Card Program Training Opening Remarks



GAO Audit Summary

GAO Audit Summary

- Background
 - Audit of PC Program at two DON activities
 - Audits conducted July 2000 through June 2001
- General Findings
 - Breakdown of Internal Controls
 - Four Key Weaknesses
- GAO announced expanded audit to encompass all of DOD June 2001

GAO Audit Findings Four Key Weaknesses

- 1. Proliferation of Purchase Cards Resulting in Unmanageable *Span of Control*
- 2. Deficient Policies for **Rebate Management**
- 3. Employees Did Not Have **Documented** Evidence of **Timely Training**
- 4. Management Did Not Effectively Use Internal Reviews and Audits



Policies & Procedures Existing and New

Policies & Procedures

- Existing Policies and Procedures
 - NAVSUPINST 4200.94
 - DON Policy Letters
 - APC Oversight Responsibilities
- Key Issues Under Review
 - Span of Control
 - Separation of Functions
 - Proliferation of Cards
 - Property Accounting

NAVSUPINST 4200.94

- What:
 - THE DON Purchase Card Policy
- Where:
 - NAVSUP Website: www.navsup.navy.mil
 - DON Purchase Card Training CD-ROM
- Who:
 - All DON Purchase Card Participants
 - APCs, AOs, Cardholders, FM

NAVSUPINST 4200.94

- Chapter 1: General Policies and Procedures
 - Scope
 - Policies
 - Definitions
 - Managing Purchase Card Programs
 - Financial Management Reqmts for Purchase Card
 - Transportation Consideration for Purchase Card
- Chapter 2: Letters of Agreement
- Chapter 3: Accommodation Checks
- Chapter 4: Use of the Governmentwide Purchase Card as a Method of Payment
- *Enclosure 1:* List of Prohibited and Special Attention Items.

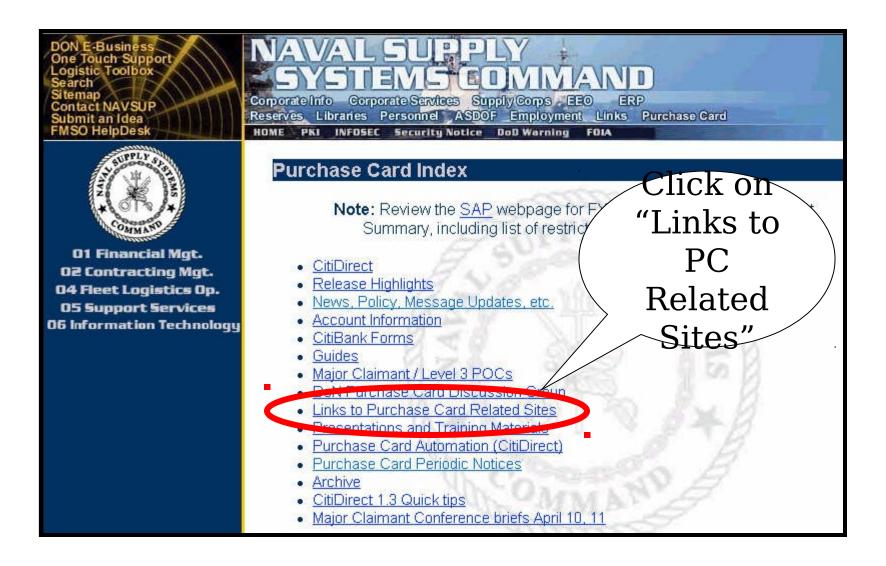
DON Policy Letters

- What Are They?
 - Interim changes to NAVSUPINST 4200.94
- Why Are They Issued:
 - Implement policy issued by DOD, ASN, FMO, etc.
 - Identify Navy-Specific Issues
- Where Can You Find Them:
 - NLL (Naval Logistics Library)http://www.nll.navsup.navy.mil/
 - The NLL index is searchable by policy group, key word and/or year issued.

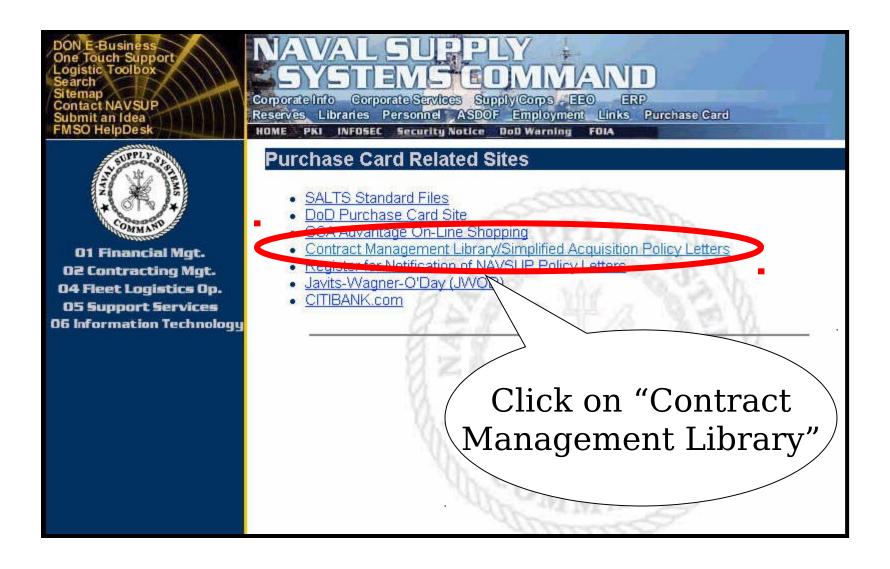
NAVSUP Home Page



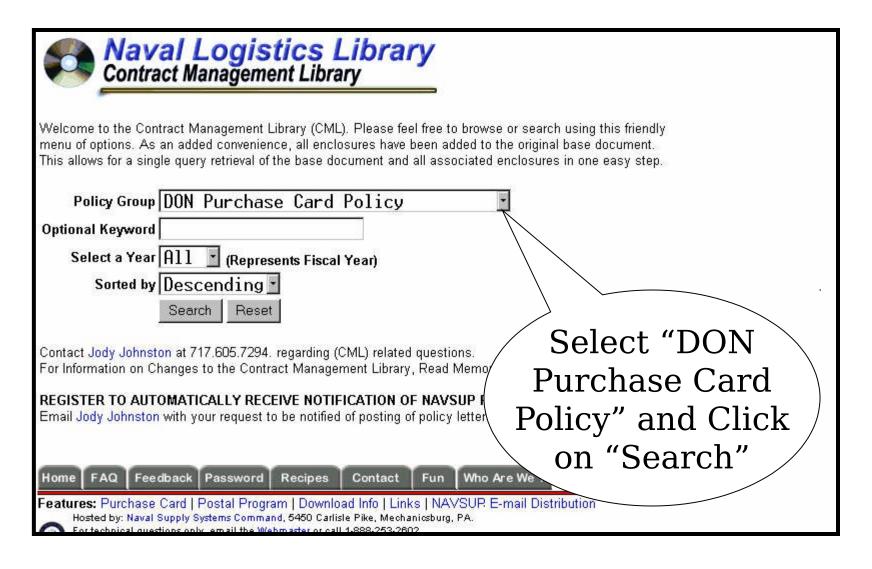
Purchase Card Index Page



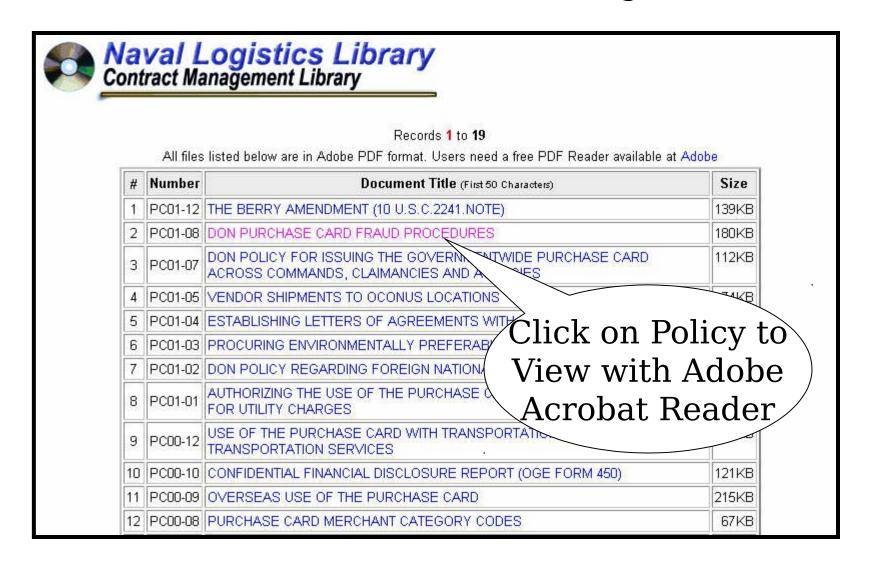
Purchase Card Related Sites Page



Contract Management Library Page



Purchase Card Policies Page



Recent Policy Letters

- PC01-01 AUTHORIZING THE USE OF THE PURCHASE CARD AS A METHOD OF PAYMENT FOR UTILITY CHARGES
- PC01-03 PROCURING ENVIRONMENTALLY PREFERABLE PRODUCTS
- PC01-05 VENDOR SHIPMENTS TO OCONUS LOCATIONS
- PC01-07 DON POLICY FOR ISSUING THE GOVERNMENTWIDE PURCHASE CARD ACROSS COMMANDS, CLAIMANCIES AND AGENCIES
- PC01-11 DON Purchase Card FRAUD PROCEDURES
- PC01-12 THE BERRY AMENDMENT (10 U.S.C. 2241.NOTE)

APC Responsibilities

- Development of Activity's IOP
- Training of all PC Program Participants
- Conduct Semi-Annual Reviews
- Documentation Requirements
 - Training
 - Reviews
 - Corrective Action
 - CH/AO Transaction Documentation

APC Responsibilities (Continued)

CH/AO Documentation Template

Each individual transaction should have the following documentation:

- CH Documentation:
 - Purchase Request Document (if applicable)
 - Receipt/Acceptance Document
 - Cardholder Purchase Card Log
 - Cardholder Statement
- AO Documentation:
 - AO Statement with Certification Statement
 - Record of Payment (optional)

Key Issues Under Review

Span of Control

- The appropriate allocation of resources to allow AOs to perform their duties accurately and completely is central to the vigilance the program requires. Billing officials are our first line of defense against fraud, waste and abuse. If they have too many CHs under their purview there is no way they can perform the required reviews and certifications of CH purchases.
- Current Guidance, Rule of Thumb is 5-7
 Cardholders per AO. Inadequate span of control leaves the government vulnerable to fraudulent, improper and abusive purchases.

Key Issues Under Review (Continued) Separation of Functions

• The Issue: CHs were found to be ordering *and* receiving/accepting goods and services.

• NAVSUPINST 4200.94 requires a minimum two way separation of functions, i.e. one person making the purchase and one person receiving and accepting the goods1

Key Issues Under Review (Continued) Proliferation of Cards

- The Issue: A proliferation of CHs resulting in unreasonable span of control.
- Only those personnel with a continuing need to purchase goods or services as part of their job should be CHs. Not every CH needs to have the maximum transaction or monthly limit.

Key Issues Under Review (Continued)

Property Accounting

- The Issue: Failure to record PC transactions in local property records.
- COs, FMs, & Property Managers are responsible for ensuring activity compliance with the DoD/DON property guidance.
- Pilferable items or sensitive items such as computers, cameras, cell phones, should be properly accounted for.

CONTACT YOUR PROPERTY MANAGEMENT OFFICE FOR SPECIFIC GUIDANCE



Awareness of Misuse, Abuse, and Fraudulent Use

Awareness of Misuse, Abuse and Fraudulent Use of the PC

"Questionable Transactions"

- Include:
 - Improper Transactions
 - Misuse
 - Abuse
 - Potentially Fraudulent Transactions

Ask yourself these questions!

- 1. Are the items required to fulfill immediate mission requirements?
- 2. Does the purchase exceed my approved spending limits?
- 3. Are the items for my personal use or the personal use of the receiving individual?
- 4. Are the purchased items specifically prohibited by NAVSUP 9400.94? (Ex: food, promotional items, hazmat)
- 5. Are these items part of a larger requirement that exceeds \$100,000?
- 6. Has this purchase been split into smaller segments to stay under the micro purchase limit of \$2,500?

Credit Card Misuse

It includes:

- items not required to meet minimum mission requirements,
- procurement of prohibited items; and
- purchases that exceed purchaser authority

Example: You have a requirement for ballpoint pens for your office. You order 48 Waterman pens at a cost of \$15 each in lieu of the Papermate pens available at a cost of 89 cents each.

Problem: Minimum mission requirements

Credit Card Abuse

Almost like misuse, but more blatant in nature, generally, it includes:

- Procurement of items that may be appropriate except for underlying details such as price unreasonableness
- Repeated and knowing misuse
- Split purchases

Example: You've been asked to purchase a new briefcase for everyone in the office to use, as needed. You purchase a beautiful designer briefcase at a cost of \$1,000.00

Problem: Price Reasonableness?

Potentially Fraudulent Use

Generally speaking, includes 3 criteria:

- A willful act
- Intended to deceive or cheat
- Bringing financial gain to oneself

Example: Your husband wants an expensive clock for his birthday, so you use the Government Purchase card and place an order over the telephone . . . The clock arrives at your home just in time for the party.

Problem: Personal Use

Fraud is a Crime!

Misuse, Abuse, and Fraudulent Use of the PC (Continued)

Responsibility/Accountability:

- Every individual involved in the DON PC Program is personally accountable for strict adherence to DON PC policies and procedures.
- CHs, AOs and APCs each carry specific responsibilities which are clearly delineated in Navy policies. You are expected to know your role and to adhere to the governing policies.

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Misuse, Abuse, and Fraudulent Use of the PC (Continued)

Potential Consequences for both civilian and military personnel:

- Revocation of the purchase card
- Reprimand
- Suspension
- Termination
- Criminal Prosecution
- Notation in performance evaluation



DON Purchase Card Support Tools

DON PC Support Tools

- PCPNs (Purchase Card Periodic Notices)
- NAVSUP Help Desk
- Training Resources
- CitiDirect
 - Dynamic Reporting
 - Canned Reports
- DON PC Program Website

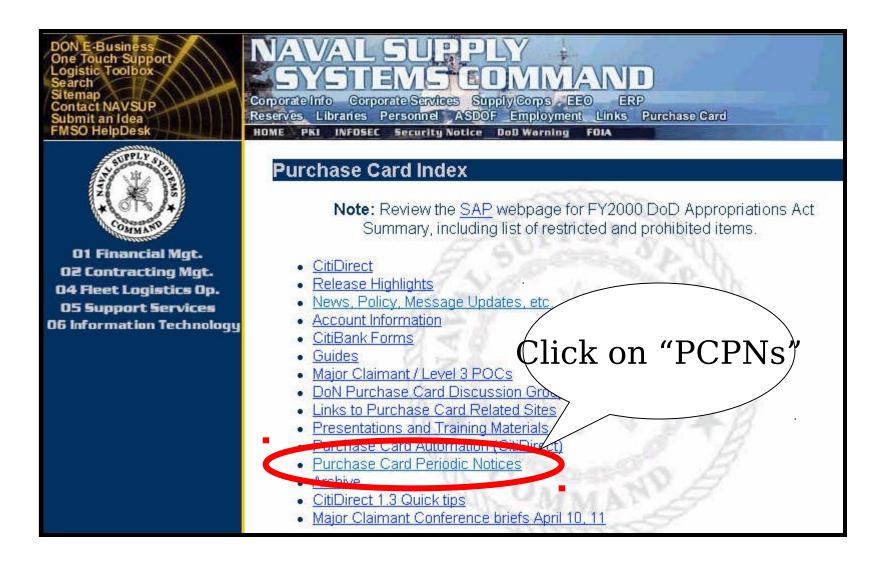
Purchase Card Periodic Notices • Program Office recognized need for better

- communication
- Issues arise that require immediate attention
- Because of the immediate nature of the content, email is deemed the preferred method of distribution
- Level 3 APCs/FMs will be notified. It will be their responsibility to ensure their activities receive the information.
- Posted to NAVSUP homepage

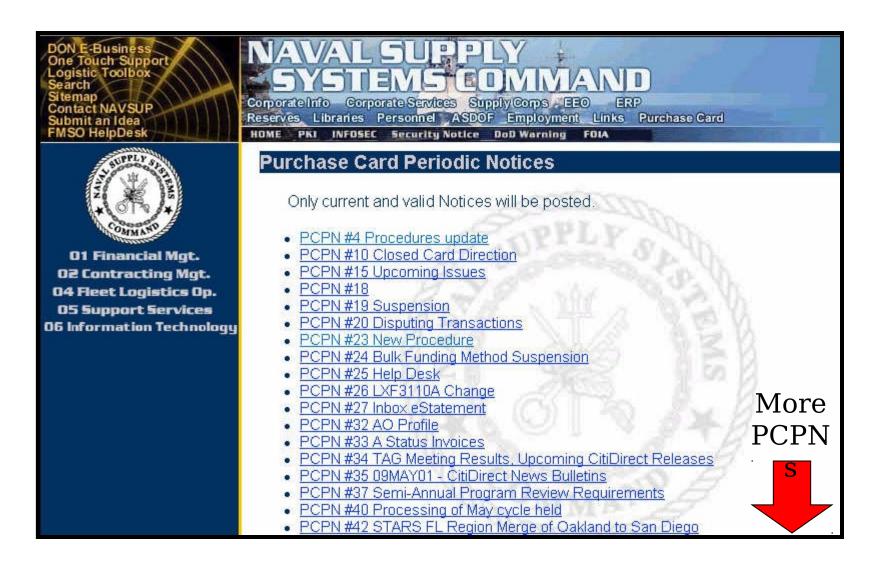
NAVSUP Home Page



Purchase Card Index Page



Purchase Card Periodic Notices



New Help Desk Process

purchasecard_navsuphq@navsup.navy. mil

- DON PC Program Office devised additional process
- Technical issues referred to CitiDirect Help Desk
- Other issues referred to NAVSUP central mailbox
- NAVSUP Personnel Review & Respond



Training

- Prior to appointment as either an APC, AO or CH the individual must receive training on DON policies and local IOP
- Documentation of successful completion of required training must be retained by the individual and his/her APC.
- Refresher training required ever two years

Training (Continued)

Prospective APCs/AOs/CHs must complete at least one of the following:

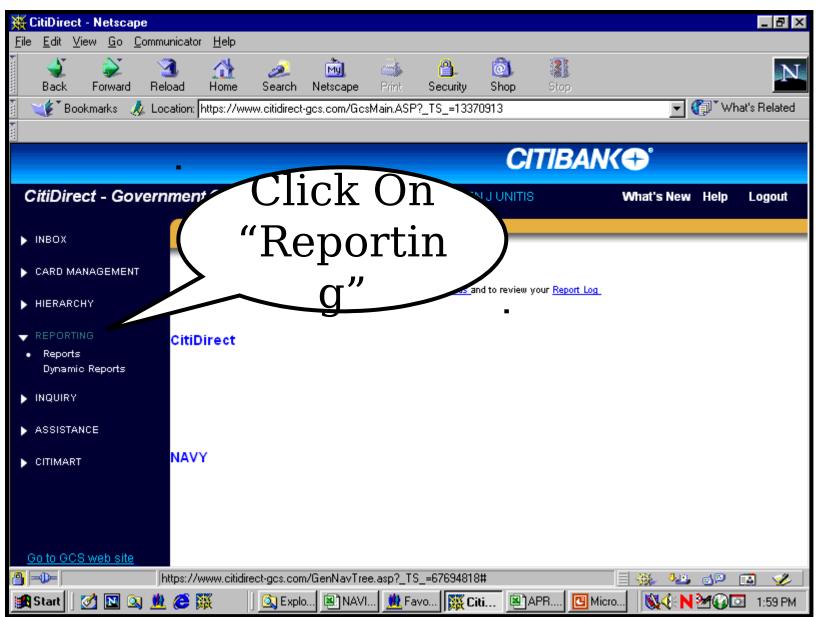
- Navy/Marine Corps PC Training and Interactive Customer Assistance CD-ROM (also available online at http://www.nll.navsup.navy.mil/)
- NAVSUP Commercial Purchase Card Course for Micropurchasers
- Cognizant HCA approved PC course
- Training requirements can be satisfied by having completed one of the following:
 - (a) NAVSUP Simplified Acquisition Course
 - (b) CON 101, Contracting Fundamentals, of 0
 - (c) CON 202, Intermediate Contracting

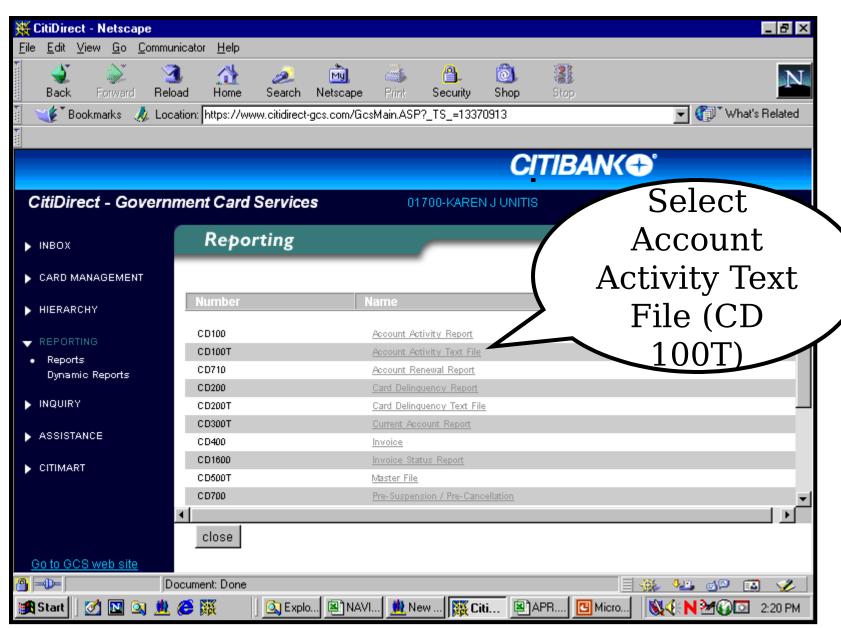
Dynamic Reporting

- A *recently fielded* PC transaction analysis tool in CitiDirect
- Designed to give PC managers a quick and efficient look at oversight metrics
- Currently available to all Level 3 APCS

"Canned" Reports

- Available to all APCs, AOs and CHs
- 24 Pre-designed reports provide data on areas such as:
 - Account activity
 - Delinquency Status
 - Vendor analysis
 - User profiles
 - Invoice status
 - Statistical Summary Data





DON PC Program Website

www.navsup.navy.mil

- Accessible by all program personnel
- Resources include:
 - Navy/Marine Corp. PC Training Ty
 - Copies of PCPNs
 - Desk Guides
 - DON Purchase Card Discussion Gro
 - Link to CitiDirect and other PC related sites
 - Citibank Forms
 - News Items



Review of Activity's IOP

Local Discussion

- Review of Local IOP
 - Provide Copy for All Attendees
 - Review IOP Documentation Requirements
 - Review IOP Separation of Function
- APC Led Q&A Session



Introduction to CD-ROM Training

Introduction to the Navy/Marine Corps Purchase Card Training CD-ROM

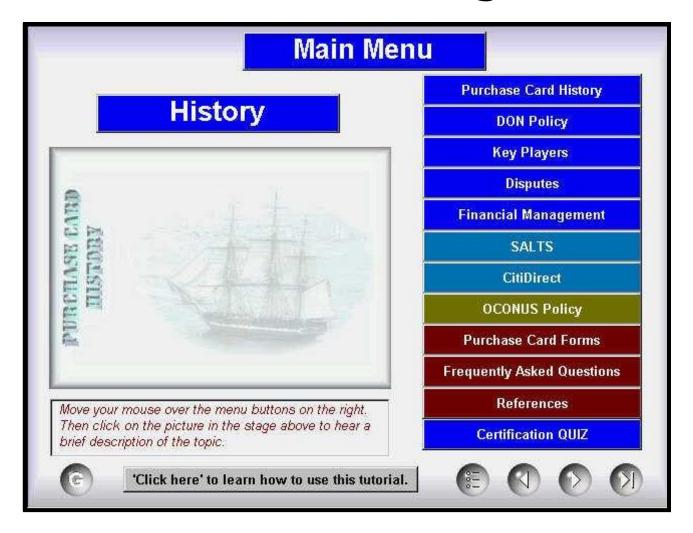
- Where to Get It.
- How to Start It.
- How to Use It.
- Certification Test.

Training CD-ROM Tour



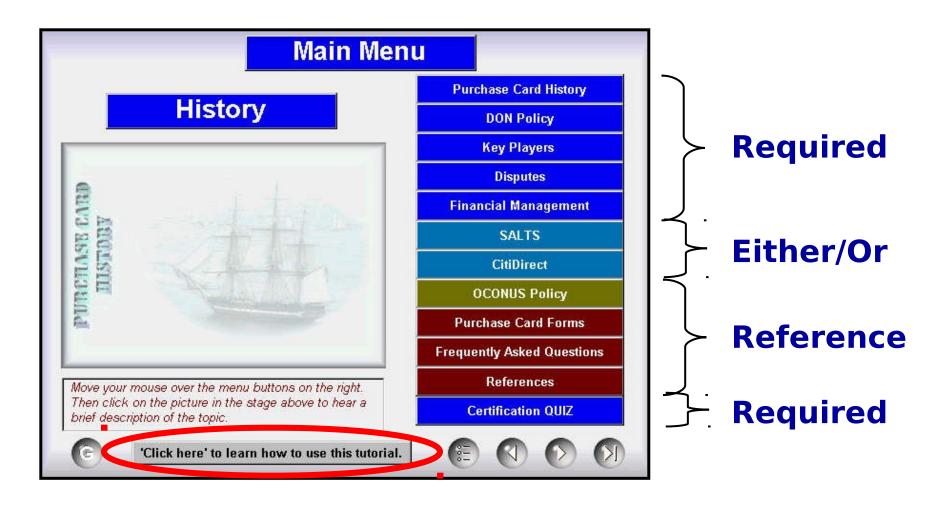
- Distributed to All APCs, AOs and Cardholders
- Supports CitiDirect& WinSALTS
- IncludesCertification Test
- Based on 50

Navy / Marine Corps Purchase Card Training CD-ROM



Proceed to Next Slide

Training CD-ROM Main Menu





Stand-Down Day Training Completion Report

Local Training Completion Report

- Everyone Complete CD-ROM Training
- Successfully Pass Certification Test
- Present Certificate to APC
- APC Report Training Metrics to Claimancy



DON Purchase Card Program Training Stand-Down Day